#### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

#### UNITED STATES OF AMERICA,

Plaintiff,

-vs.-

Civil Action No. 06-11753 Hon. Nancy G. Edmunds

PETER ERIC HENDRICKSON and DOREEN M. HENDRICKSON,

Defendants.

#### PLAINTIFF'S MOTION TO AMEND JUDGMENT

The plaintiff, the United States of America, pursuant to Fed. R. Civ. P. 52(b) and 58,

moves to amend the Judgment (doc. #22) entered in the above-captioned civil action on

January 26, 2007. The grounds for this motion are set forth in the memorandum of law filed herewith.

This motion is based on the pleadings, the records and files in this case, and the memorandum of law submitted in support of the plaintiff's motion to amend the judgment. A proposed Amended Judgment and Order of Permanent Injunction has also been submitted.

WHEREFORE, the plaintiff, the United States of America, respectfully requests that the

Court enter the attached Amended Judgment and Order of Permanent Injunction.

Dated this  $2^{nd}$  day of March, 2007.

STEPHEN J. MURPHY, III United States Attorney

WILLIAM L. WOODARD Assistant United States Attorney

/s/ Robert D. Metcalfe

ROBERT D. METCALFE ANNE NORRIS GRAHAM STEPHEN J. SCHAEFFER Trial Attorneys, Tax Division U.S. Department of Justice P.O. Box 7238 Ben Franklin Station Washington, D.C. 20044 Tel. (202) 307-6525 Fax (202) 514-6770 Robert.D.Metcalfe@usdoj.gov

Attorneys for Plaintiff United States of America

## CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2007, I electronically filed the foregoing

# PLAINTIFF'S MOTION TO AMEND JUDGMENT with the Clerk of the Court using the

CM/ECF system. I hereby certify that I have mailed by United States Postal Service the

documents to the following non-CM/ECF participants:

Peter Eric Hendrickson 232 Oriole Road Commerce Township, MI 48382

Doreen M. Hendrickson 232 Oriole Road Commerce Commerce Township, MI 48382

## /s/ Robert D. Metcalfe

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